

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

TITUS DEPEAL,

Case No. 1:25-cv-11276

Plaintiff,

v.

Hon. Thomas L. Ludington

WOLVERINE HUMAN SERVICES,  
et al.,

Defendants.

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**STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS SAGINAW INTERMEDIATE SCHOOL  
DISTRICT AND SAGINAW INTERMEDIATE SCHOOL DISTRICT  
BOARD OF EDUCATION'S MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiff and Defendants Saginaw Intermediate School District Saginaw Intermediate School District Board of Education that the deadline for the Plaintiff to file a response to Defendants Saginaw Intermediate School District Saginaw Intermediate School District Board of Education's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6) (ECF No. 11) is extended from July 23, 2025, to Tuesday, September 2, 2025.

Plaintiff respectfully requests this additional time for the following reasons. Attorney Cornish's twin daughters passed away within the last month and he is

recently returning to work after an extended bereavement leave. Attorney Cornish is lead counsel in this matter. Attorney Abdnour agreed to serve as local counsel to assist Attorney Cornish in filing the Complaint before the statute of limitations ran while he awaited approval of his application for admission to this Court, but Attorney Abdnour has no specific knowledge of the case.

No Party will be prejudiced by extending the deadlines in this matter and Defendants Saginaw Intermediate School District Saginaw Intermediate School District Board of Education consent the proposed extension.

**IT IS SO STIPULATED** on July 23, 2025.

s/ Elizabeth K. Abdnour

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s/ Kailen C. Piper with permission

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*Attorneys for Defendants Saginaw  
Intermediate School District Saginaw  
Intermediate School District Board of  
Education*

**IT IS SO ORDERED.**

Dated: July 29, 2025

s/Thomas L. Ludington  
THOMAS L. LUDINGTON  
United States District Judge